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FIRM and AFFILIATE OFFICES

MICHAEL CHARTAN
DIRECT DIAL: +1 212 692 1016
PERSONAL FAX: +1 212 253 4271
E-MAIL: mchartan@duanemorris.com

www.duanemorris.com

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August 12, 2014

VIA ECF AND FACSIMILE

Honorable Paul G. Gardephe
Thurgood Marshall United States Courthouse
40 Foley Square, Chambers 2204
New York, New York 10007-1312

MEMO ENDORSED

The Application is granted. *The Clerk will*

SO ORDERED: *Hermes Dkt. No.*

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: *Aug 15, 2014*

Re: **Lockheed Martin Corporation, et al. v. MTA, et al.**
Nos. 09 CV 4077 and 09 CV 6033(PGG) (GWG)

Dear Judge Gardephe:

Our firm is counsel to Plaintiff Lockheed Martin and co-counsel for the Surety Plaintiffs. We write to request leave to file a memorandum of law in opposition to Defendants Motions in Limine that exceeds Your Honor's twenty-five page limit for opposition. We respectfully ask permission to file an opposition memorandum of law not to exceed sixty-five pages.

Defendants have moved to prevent introduction into evidence of nine separate categories of documents and declarations of three Lockheed Martin witnesses including two experts and a witness on damages. Lockheed Martin's memorandum will include its opposition to all nine branches of Defendants' motion. The issues raised by Defendants lack merit but to explain why cannot be done in twenty-five pages due to how Defendants' structured their motion.

Thank you for considering our request.

Respectfully,

Michael Chartan

Michael Chartan

MC:ag

cc: Ira J. Lipton, Esq.,
Adam P. Friedman, Esq.,

DUANE MORRIS LLP

1540 BROADWAY NEW YORK, NY 10036-4086

PHONE: +1 212 692 1000 FAX: +1 212 692 1020
DM114873676.1